

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

NELSON L. BRUCE,

Plaintiff,

v.

LEXISNEXIS RISK SOLUTIONS INC., *et al.*

Defendants.

Case No.: 2:22-cv-02211-BHH-MGB

**DEFENDANT LEXISNEXIS RISK SOLUTIONS INC.’S MOTION TO SET ASIDE
DEFAULT AND RESPONSE IN OPPOSITION TO PLAINTIFF’S AMENDED MOTION
FOR DEFAULT JUDGMENT**

Defendant LexisNexis Risk Solutions Inc. (“LNRS”), by counsel, hereby specially appears in this case to move this Court to set aside the default entered on March 29, 2023 and oppose Plaintiff Nelson Bruce’s Amended Motion for Default Judgment, Dkt. No. 79. A memorandum and affidavit in support of LNRS’ Motion and in opposition to Plaintiff’s Amended Motion is filed contemporaneously herewith and incorporated herein by reference. Pursuant to Local Rule 7.02, the undersigned did not confer with *pro se* Plaintiff regarding this Motion and Opposition to Plaintiff’s Amended Motion for Default Judgment.

WHEREFORE, for good cause shown, LNRS respectfully requests the Court set aside the default entered against LNRS, deny Plaintiff’s Amended Motion for Default Judgment, and grant any further relief the Court may deem appropriate.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

This the 31st day of March, 2023.

/s/ William J. Farley III

William J. Farley III

Fed. Bar No. 12004

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*Counsel for Defendant LexisNexis Risk Solutions
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of March 2023, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system and also sent via U.S. Mail to the following:

Nelson L. Bruce
PO Box 3345
Summerville, SC 29484

Pro Se Plaintiff

/s/ William J. Farley III

William J. Farley III